

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF MARSHA
CHIEN IN SUPPORT OF
WASHINGTON'S REPLY IN
SUPPORT OF ITS MOTION TO
EXCLUDE EXPERT TESTIMONY
OF DAVID LEWIN, PH.D.

Pursuant to 28 U.S.C. § 1746(2) I, Marsha Chien, state and declare as follows:

1. I am over 18 years of age, have personal knowledge of and am competent to testify about the matters contained herein.
2. I am an Assistant Attorney General for the Attorney General of Washington, and am one of the attorneys representing the State of Washington ("Washington") in this matter.
3. On September 20, 2018, The GEO Group, Inc. ("GEO") served on Washington the report of its proposed expert, Gregory S. Bingham. Attached hereto as **Exhibit A** is a true and correct excerpt from Bingham's report.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed this 30th day of November, 2018, in Seattle, Washington.

s/ Marsha Chien

MARSHA CHIEN, WSBA 47020

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

November 30, 2018

s/Caitilin Hall
Caitilin Hall, Legal Assistant

DECLARATION OF MARSHA CHIEN IN
SUPPORT OF WASHINGTON'S REPLY IN
SUPPORT OF ITS MOTION TO EXCLUDE
EXCLUDE EXPERT TESTIMONY OF DAVID
LEWIN, PH.D.

ATTORNEY GENERAL OF WASHINGTON
Civil Rights Unit
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

CHIEN DECLARATION
EXHIBIT A



State Of Washington v. The GEO Group Inc.
Case No. 3:17-cv-05806-RJB

Expert Report Of Gregory S. Bingham

The Kenrich Group LLC

1919 M Street, NW, Suite 620

Washington, DC 20036

20 September 2018

A handwritten signature in blue ink, reading "Greg S. Bingham", written over a horizontal line.

Gregory S. Bingham

**State Of Washington v. The GEO Group Inc.
Expert Report Of Gregory S. Bingham**

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